

EXHIBIT “2”

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November 4, 2019

Mr. Steven W. Myhre
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Mr. Myhre,

This is my victim impact statement related to LaTonia Smith. As a victim, I plead that the Court not grant Ms. Smith release under any condition, as I believe she is obsessively committed to harming me and those around me and will not be kept away from me by any terms or restrictions.

I do not know Smith except as a related party in a civil suit on which I have worked in a limited role as an associate attorney. After my legal assistant received and opened a hateful death threat letter addressed to her and me, I obtained Temporary Protective Orders ("TPOs") against Smith in the Reno Justice Court. I believe that Ms. Smith has since become obsessed with harming me in significant and irreparable ways, including the filing of multiple lawsuits falsely accusing me, the filing of a TPO in Las Vegas falsely accusing me of harming her, and the filing of false police reports against me in which she created bizarre cartoons as fabricated "evidence." On October 8, 2019, the Las Vegas Justice Court set aside Ms. Smith's TPO *Nunc Pro Tunc* and made a finding that questioned her credibility. That Order was entered on October 28, 2019, just three days before Ms. Smith attacked me.

The multiple court filings by Ms. Smith include language directed at me that is hate-filled, racially-charged, and appears to escalate in intensity with each piece she writes. She has lodged claims against me that include an allegation that I sexually assaulted her on a public sidewalk outside of the Reno Municipal courthouse the very day that I secured a TPO against her. That allegation was directly refuted by the Affidavit of the retired law enforcement officer that escorted me and my colleagues to the hearing and walked us back to the car in which we drove to our office. She did not lodge that false allegation with the police or the Las Vegas Justice Court until three months after she alleges it occurred, and did not make those allegations to Reno Judge Pierre Hascheff at a subsequent hearing on the same TPO. She lodged the allegations when she did because she received a cease and desist letter from my counsel who was responding to unwanted attempts by Ms. Smith to contact me.

This is just another example of how her conduct toward me escalates. Her allegations beyond being utterly and demonstrably false, have left me deeply humiliated. Ms. Smith has accused me in publicly-filed documents of being part of a racist conspiracy (with the judges of the State of Nevada), of committing sexual assault against her at a courthouse, and has referred to me over and

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over as a "dangerous sexual predator." Her fixation and determination on harming me makes me deeply fear the possibility of her release, as my prior fear that she would become violent became a reality on October 31, 2019.


On Halloween night, Smith came to my door in Reno with a gun while I was alone in my apartment. I have no idea how she tracked me to my address. I have no idea how long she had been in Reno watching me. I am terrified that she would drive from Las Vegas to Reno with a firearm just to see me and am concerned she has been stalking me and those around me for some time. After I answered the door, Smith forced her way into my home with the gun, knocking me to the floor. She pointed the gun at me while I lay on the floor and told me, calmly, we were "just going to have a chat." I forced my way past her and out the door. Smith's actions appeared calculated (ringing my doorbell on Halloween night when I would answer) and deliberate.

Since that night I have experienced constant and intense fear and anxiety. I feel physically ill. I do not want to be alone. I have not returned to my apartment, and will not live there in the future. I question whether I will be able to safely live in the State in the future if/when Smith is free. It may not matter, as she stalked me to Reno, hundreds of miles from her home and the locus of her lawsuits.

I do not know when this will end. My only relief came when Smith was placed in custody. If she is released, she already knows my work and home address and I believe likely knows addresses of my friends and family.

I believe from her conduct that Ms. Smith is triggered to lash out against me and others when she experiences an adverse result in her litigation efforts. Her arrest will, without any doubt, do nothing to alleviate her irrational obsession with harming me—it will make it worse. If she is released, I do not know what I will do to create any feeling of safety for myself or the people around me.

Thank you for your consideration.



Wade Beavers